

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

In re:

**VERONICA SAENZ
Debtor(s).**

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**Case No. 22-20164
(Chapter 13)**

**DEBTOR'S EMERGENCY VOLUNTARY MOTION
TO DISMISS CHAPTER 13 CASE**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING, UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS

Emergency relief has been requested. If the Court considers the motion on an emergency basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the emergency consideration is not warranted, you should file an immediate response.

TO THE HONORABLE JUDGE OF SAID COURT:

Comes Now, Debtor(s), in the above-styled matter, by and through their attorney of record, and files this Emergency Motion for Voluntary Motion to Dismiss Chapter 13 Case and would show the Court as follows:

1. This case was commenced by the filing of a voluntary petition under Chapter 13 of Title 11 of the United States Bankruptcy Code on 7/9/2022.
2. This case has not been previously converted under Sections 706, 1112, or 1208 of the Bankruptcy Code.

3. Debtor's case was scheduled for a 341 Meeting on 8/16/2022. Debtor did not appear. However, debtor's counsel, Kevin Lambert appeared and, on the record, made an announcement informing counsel for the Trustee, Kathryn Anderson that due to the recent findings regarding the foreclosure sale of debtor's home on June 7, 2022, the debtor has decided not to continue with this current case.

4. On August 12, 2022, an Agreed Order Conditioning Automatic Stay was filed which allows the Debtor and Occupants to remain in the property through September 30, 2022, by 5:00 p.m. and ARCPE 1, LLC. shall make no attempt to evict the Debtor and Occupants prior to October 1, 2022. Upon agreement with all parties, the Order shall apply should the case be converted to a chapter 7 or debtor dismisses the case.

5. Further, debtor is not in a financial position to continue with this current case and the payroll deductions are creating a hardship for the debtor.

6. Wherefore Debtor requests that her Chapter 13 Bankruptcy be dismissed without prejudice.

Respectfully submitted,
RAUB LAW FIRM,

08/30/2022
Dated

/s/ Timothy D. Raub
Timothy D. Raub
State Bar No. 00789570
Federal I.D. No. 22942
814 Leopard Street
Corpus Christi, Texas 78401
Telephone No. 361-880-8181
email: bk@raublawfirm.com

After being fully informed and advised of the consequences of a dismissal of my Chapter 13 case, I have requested my attorney to file the necessary documents with the Bankruptcy Court so as to cause my case to be dismissed.

Dated: 08/30/2022

/s/ Veronica Saenz

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this motion was served to Chapter 13 Trustee, U.S. Trustee, to the Debtor(s), and to all the creditors listed herein on the attached matrix on this the 30th day of August 2022.

/s/ Timothy D. Raub

Timothy D. Raub

State Bar No. 00789570

Federal I.D. No. 22942

Along with attached Debtor(s) Creditor Matrix

Label Matrix for local noticing
0541-2
Case 22-20164
Southern District of Texas
Corpus Christi
Tue Aug 30 22:45:35 CDT 2022

ARCPE 1, LLC
Attn: John Olsen
1900 Sunset Harbour Dr 2nd Floor
Miami Beach, FL 33139-1400

Dominique Lane
525 Poenisch Dr
Corpus Christi, TX 78412-3172

HUGHES, WATTERS & ASKANASE, LLP
Anthony A. Garcia
1201 Louisiana 28th Floor
Houston, TX 77002-5607

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

PHH MORTGAGE
PO BOX 5452
Mount Laurel, NJ 08054-5452

RMP SRVC LLC
200 N. NEW ROAD
WACO, TX 76710-6932

TRELLIS COMPANY
1609 CENTRE CREEK DRIVE
AUSTIN, TX 78754-5178

TXU ENERGY RETAIL COMPANY LLC
C/O BANKRUPTCY DEPARTMENT
PO BOX 650393
DALLAS TX 75265-0393

WSTSHMRK
801 S ABE
SAN ANGELO, TX 76903-6735

Deutsche Bank National Trust Company, as Tru
c/o Codilis & Moody, P.C.
400 N. Sam Houston Pkwy E, Suite 900A
Houston, TX 77060-3548

CREDIT MANAGEMENT LP
6080 TENNYSON PKWY STE 1
PLANO, TX 75024-6002

FIG LOANS TEXAS LLC
335 MADISON AVE FLOOR 16
NEW YORK, NY 10017-4614

INTERNAL REVENUE SERVICE
P O Box 7346
Philadelphia PA 19101-7346

NATIONAL CREDIT ADJUST
327 W 4TH AVE
HUTCHINSON, KS 67501-4842

POSSIBLE FINANCIAL INC
500 YALE AVE. N
SEATTLE, WA 98109-5680

Raub Law Firm
814 Leopard
Corpus Christi, TX 78401-2422

TRELLIS COMPANY
PO BOX 83100
ROUND ROCK, TX 78683-3100

US Trustee
606 N Carancahua
Corpus Christi, TX 78401-0680

Clayton Lockleer Everett
Norred Law Firm, PLLC
515 E. Border St.
Arlington, TX 76010-7402

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United States Bankruptcy Court
1133 North Shoreline Blvd #208
Corpus Christi, TX 78401-2042

Deutsche Bank National Trust Company
c/o Codilis & Moody, P.C.
400 N. Sam Houston Pkwy E, Suite 900A
Houston, TX 77060-3548

FIRST PREMIER BANK
3820 N LOUISE AVE
SIOUX FALLS, SD 57107-0145

LVNV FUNDING LLC
PO BOX 1269
GREENVILLE, SC 29602-1269

Nueces County
c/o Diane W. Sanders
Linebarger Goggan Blair & Sampson, LLP
P.O. Box 17428
Austin, TX 78760-7428

Pink Dogwood 13, LLC
PO BOX 1931
Burlingame, CA 94011-1931

SECURITY FINANCE
C/O SECURITY FINANCE
SPARTANBURG, SC 29304

(p)TXU ENERGY RETAIL COMPANY LP
CO BANKRUPTCY DEPARTMENT
PO BOX 650393
DALLAS TX 75265-0393

VANCE & HUFFMAN LLC
55 MONETTE PKWY STE 100
SMITHFIELD, VA 23430-2577

Timothy D Raub
Raub Law Firm PC
814 Leopard
Corpus Christi, TX 78401-2422

Veronica Saenz
525 Poenisch Dr
Corpus Christi, TX 78412-3172

Yvonne V Valdez
Chapter 13 Trustee
555 N Carancahua Suite 600
Corpus Christi, TX 78401-0823

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

TXU ENERGY
200 W JOHN CARPENTER FWY
IRVING, TX 75039

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ARCPE 1 LLC

(u)Nueces County

End of Label Matrix	
Mailable recipients	31
Bypassed recipients	2
Total	33